

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LAUREN ASHLEY MORGAN; ERIK
BARNES; SHERRY BASON; LOIS WINN;
GEORGES EMMANUEL NJONG DIBOKI;
JULIA SIMS; and SOPHIA WOODLAND,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

REALPAGE, INC.; GREYSTAR REAL
ESTATE PARTNERS, LLC; LINCOLN
PROPERTY CO.; CUSHMAN &
WAKEFIELD, INC.; FPI MANAGEMENT,
INC.; RPM LIVING, LLC; BH
MANAGEMENT SERVICES, LLC; MID-
AMERICA APARTMENT COMMUNITIES,
INC.; MORGAN PROPERTIES, LLC;
AVENUE5 RESIDENTIAL, LLC; BOZZUTO
MANAGEMENT COMPANY; AVALONBAY
COMMUNITIES, INC.; HIGHMARK
RESIDENTIAL, LLC; EQUITY
RESIDENTIAL; THE IRVINE COMPANY,
LLC; ESSEX PROPERTY TRUST, INC.; ZRS
MANAGEMENT, LLC; CAMDEN PROPERTY
TRUST; UDR, INC.; CONAM
MANAGEMENT CORPORATION;
CORTLAND PARTNERS, LLC; THRIVE
COMMUNITIES MANAGEMENT, LLC;
SECURITY PROPERTIES INC.; CWS
APARTMENT HOMES, LLC; PROMETHEUS
REAL ESTATE GROUP, INC.; SARES REGIS
GROUP OPERATING, INC.; MISSION ROCK
RESIDENTIAL, LLC; and MORGAN GROUP,
INC.,

Defendants.

No. 2:22-cv-01712-RSL

STIPULATED MOTION AND
ORDER SUSPENDING
DEADLINE FOR DEFENDANT
AVENUE5 RESIDENTIAL, LLC
TO RESPOND TO COMPLAINT

STIPULATED MOTION AND ORDER
SUSPENDING DEADLINE FOR DEFENDANT
AVENUE5 RESIDENTIAL, LLC TO RESPOND TO
COMPLAINT - 1
[2:22-cv-01712 RSL]

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Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiffs Lauren Ashley Morgan, Erik Barnes, Sherry Bason, Lois Winn, Georges Emmanuel Njong Diboki, Julia Sims, and Sophia Woodland (collectively, "Plaintiffs") and Defendant Avenue5 Residential, LLC, by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Plaintiffs filed a Class Action Complaint (the "Complaint") on December 2, 2022. ECF No. 1;

WHEREAS, Plaintiffs and certain other Defendants ("Stipulating Defendants") entered a Stipulation that, for purposes of judicial efficiency, would temporarily suspend the date for a responsive pleading to the Complaint;

WHEREAS, the Court subsequently entered an Order [ECF No. 83] that, inter alia, suspended the date for the Stipulating Defendants to respond to the Complaint, and required the parties to submit a status report by January 18, 2023;¹ and

WHEREAS, Plaintiffs and Defendant Avenue5 Residential believe that judicial efficiency would be served by suspending the date for Avenue5 Residential to move, answer or otherwise respond to the Complaint, and to participate in the joint status report.

In making this stipulation, Avenue5 Residential does not waive, in this or any other action, any (i) defenses or arguments for dismissal that may be available under Fed. R. Civ. P. 12; (ii) affirmative defenses under Fed. R. Civ. P. 8; (iii) other statutory or common law defenses that may be available; or (iv) right to seek or oppose any reassignment, transfer, or consolidated alternatives.

THEREFORE, Plaintiffs and Defendant Avenue5 Residential, LLC stipulate and agree to suspend the deadline for Avenue5 Residential, LLC to answer, move to dismiss, or otherwise

¹ Substantially identical stipulations have been entered by this Court in *Navarro v. RealPage, Inc. et al.*, No. 2:22-cv-01552 (W.D. Wash.); *Alvarez et al. v. RealPage, Inc. et al.*, No. 2:22-cv-01617 (W.D. Wash.); *Cherry et al. v. RealPage, Inc. et al.*, No. 2:22-cv-01618 (W.D. Wash.); and *Armas et al. v. RealPage et al.*, No. 2:22-cv-01726 (W.D. Wash.).

respond to the Complaint and request that the Court enter the proposed order pursuant to this stipulation.

STIPULATED to this 13th day of January, 2023.

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STIPULATED MOTION AND ORDER
SUSPENDING DEADLINE FOR DEFENDANT
AVENUE5 RESIDENTIAL, LLC TO RESPOND TO
COMPLAINT - 3
[2:22-cv-01712 RSL]

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ORDER

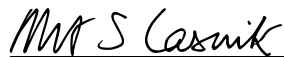
THIS MATTER came before the Court on the parties' Stipulated Motion to Suspend the Deadline for Defendant Avenue5 Residential, LLC to Respond to the Complaint. Now, therefore,

IT IS HEREBY ORDERED THAT:

Consistent with this Court's Order of December 21, 2022 [ECF No. 83], the deadline for Defendant Avenue5 Residential, LLC to answer, move to dismiss, or otherwise respond to the Complaint is hereby suspended.

Defendant Avenue5 Residential, LLC shall meet and confer with Plaintiffs, and participate in the filing of the joint status report, as covered by the Court's prior Order, due on January 18, 2023.

Dated this 17th day of January, 2023.



Robert S. Lasnik
United States District Judge